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DEPARTMENT OF ECOLOGY

Northwest Regional Office, 3190 - 160th Ave S.E. • Bellevue, Washington 98008-5452 • (206) 649-7000

December 22, 1992

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RCRA PERMITS SECTION

Mr. John Stiller
Burlington Environmental Inc.
2203 Airport Way South
Suite 400
Seattle, WA 98134

Dear Mr. Stiller:

Re: Designation of Materials Removed From Interim Status Tanks at Pier
91 Facility, WAD000812917

Thank you for sending me the Closure Plan for the Pier 91 Facility. I have reviewed the information in the plan and at this point request that the following additions and/or corrections be made:

1. Please make available any analytical data regarding the designation of the materials emptied from tanks 115, 116, 117, 118, and 165 in 1989, as described in section 2.3 of the closure plan, it should be sent to me for review and should be included in the plan. Specifically, this information should address whether or not the materials removed from these tanks are designated as dangerous waste.

In addition, you state that tanks being removed from dangerous waste service will undergo decontamination procedures outlined in the closure plan, section HH. In the Pier 91 Facility permit application, closure information is contained within Section I. Please indicate whether or not the procedures outlined in Section I are the closure procedures that will be used to the above referenced tanks. If not, please provide a description of the procedures to be used. In addition, please indicate a time line for these closure activities.

2. In the Closure Plan, no reference is made to standards for sampling and analysis; please include such information or make reference to an already existing plan that you intend to use.
3. In the Closure Plan, you make reference to the fact that certain tanks are, and historically have been, operated by the Pacific Northern Oil Company (PANOCO). In the body of the report, you reference the original lease as dating back

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to 1974. The lease copy provided in the appendices to the report however, is dated 1981 and is apparently a revised version. Please send a copy of the original PANOCO lease or provide an explanation of the inclusion of the revised lease only.

Thank you for your cooperation in this matter. Please contact me with any questions at 649-7216.

Sincerely,



Joshua Chaitin
Hazardous Waste Inspector
Solid and Hazardous Waste Program

JC:jc:cw

cc: Julie Sellick, Ecology
Barb Smith, Ecology
Galen Tritt, Ecology
Doug Brown, Permits
David Croxton, EPA-Region X
Sue Roth, Kennedy-Jenks Consultants